

# Nathan M. Hansen

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November 17, 2014

VIA CM/ECF

The Honorable John R. Tunheim  
United States District Court  
13E U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415

**Re: Reedquist v. McKay**  
**D. Minn. Case No. 14-3242**

Dear Judge Tunheim:

I write to request permission to file a Motion to Reconsider pursuant to Local Rule 7-1(j). My basis for this request is as follows:

The summons and complaint that were removed to US District Court were dated June 24, 2013. 2013 as a date was likely a typographical error. This case was never filed in Ramsey County District Court. My client, Kelly McKay, was personally served with the summons and complaint on August 4, 2014. The Defendant removed the case to US District Court on August 22, 2014. This is well within the 30 days required by Federal Rule of Bankruptcy Procedure 9027 for removal.

The Plaintiff asserted in a document that she filed that she was not attempting to collect a debt. The best information available to my client right now is that she, my client, has in excess of \$30,000 in equity in the property at issue. The complaint, in paragraph 10, asserts: "Based on...Defendant's bankruptcy filing...Plaintiff states that there is no equity in the Property that is owed to the Defendant." The complaint seeks an offset of a debt discharged in bankruptcy against equity in a parcel of real property. This is an attempt to collect a debt and is a violation of the discharge injunction. The Plaintiff's assertion that she was not attempting to collect a debt was in error and belies the plain text of her complaint.

Based upon the foregoing, I respectfully ask for permission to file a motion to reconsider your order entered on November 10, 2014 remanding this case to state court.

Respectfully,

/e/ Nathan M. Hansen

C: Louis Remele (via CM/ECF)  
Jennifer Reedquist (via e-mail and U.S. Mail)